

IN Re: WC Docket No. 05-196

VoIP Compliance Report
November 28, 2005

Of

Quick Connect VoIP, LLC
A Michigan Limited Liability Corporation
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A. Market area – PSAP information.

Quick is a small VoIP provider that markets only in the state of Michigan. Quick is not a facilities based CLEC and started providing service by purchasing switching services from a Michigan facilities based interconnected CLEC. This CLEC, as all others, had no suspicion that the FCC would require VoIP providers to provide 911 services to sell its services before it issues its June 3, 2005 Order. This CLEC had limited coverage in Michigan and has been unable to expand its 911 coverage by the November 29, 2005 deadline date.

We chose this CLEC because it provided support for many Different manufactures of ATA or Customer Premises devices. We found that Quality of Service was a real issue with the first two manufactures whose devices we sold and supported.

We just found another CLEC who has far wider Michigan 911 coverage, provided in the list attached, but it does not support the manufacture that we have found to have the best quality of service. Going forward, we can sell the equipment of the manufacturer that this new CLEC supports to locations where it has coverage but our first CLEC does not. However, we can not switch the service of our customers in the areas covered by the new CLEC (but not the first CLEC) without the customer changing out their CPE. Hence, we can not provide 911 services to this class of subscriber unless they are willing to buy new equipment. We will send them a letter and email advising them of this option, but we doubt that anyone of them will elect to buy new equipment. For those that elect not to buy the new equipment, Quick will not terminate their service, but we will send them stickers to place on their equipment advising that the equipment does not provide 911.

Any requirement to provide 911 to said class of customers for them to maintain service would be an unconstitutional an ex-post facto law , as it would have the effect of outlawing their equipment and service that was legal at the time of purchase, and confiscating its value.

As indicated, going forward, today and following, we will sacrifice quality of service to provide 911 in the areas covered by our new CLEC, by selling the inferior equipment that this CLEC supports so that the customer can make a 911 call on their VoIP phone, which may be their second line and used to save money for strictly for outbound calls only.

There is no statewide default PSAP in Michigan.

B. 911 coverage area.

Attached is a list of the rate centers, correlated to counties, in Michigan in which we can provide 911 on a going forward basis. Also attached is a state map which translates the list to its approximate coverage on a county by county basis. We will shortly institute a look up function on our web site where a potential subscriber can enter in their NPA nxx for a quick check as to whether or not we can provide 911 and there fore VoIP service to them

C. Obtaining initial Registered Location information.

Quick has made two separate mailings with stickers on or about July 30, and again on or about September 15, 2005. we also sent emails to on or about July 30 to our entire VoIP customer base. In the last two weeks of September, we placed telephone calls to all non compliers and left voice mail messages for those who did not answer the phone. All or our accounts have voice mail.

Quick received back written responses from ninety three (93%) percent of our currently active customers. During this process we lost nearly 16% of our customer base.

Following the November 28 deadline, Quick will email to those customers who did not return the 911 initial resident location form, to whom we can provide 911, a notice that Quick will use their address that appears on their service application as their initial resident Location, along with instructions as to how to change that address if the end user finds our assumption is inaccurate for any reason.

As to those customers that are located in an area not where our first CLEC does not have 911 coverage, who do have equipment supported by our second CLEC, we are in the process of changing over their service to the second CLEC. This however may require a new LOA to change the Port of their phone number from the first CLEC to the second CLEC and could be time consuming, and the end user may not co-operate at all, since we have no duty to suspend service and will not do so. However, we will advise them that unless they do co-operate, we will NOT provide them with 911 services. As to those who do not have equipment supported by our second CLEC, we will send them a notice advising them of their option to buy the supported equipment to enable them to gain 911 services. We will mail stickers to both the latter groups and advice them to place them on their equipment which will state in clear language that 911 is not available on such device.

D. Obtaining updated Registered Location information.

A Quick VoIP customer can change their Registered Location information by visiting our web site and entering in their User name and Password, or by calling our customer service department using their same equipment that they use to access our service. In both cases, they are required to advise us of the exact name of the end user that executed our service agreement along with that persons mother's maiden name to assure us that we are dealing with a valid request from our subscriber, and not some one playing games.

E. Nomadic subscribers.

Quick has no indication that we have any nomadic subscribers, and therefore we have no solution to detect same. All Quick customers sign a form advising them that we only provide service in the state of Michigan and that should they move their equipment outside of our service area, we can not provide 911 and will suspend their VoIP service. Our limited coverage area keeps nomadic subscribers from subscribing to our VoIP services.

In any event, all we can tell is whether a customer has changed their IP address. This does not give us specific information to locate their address at the moment of transmission. Additionally, our CLECs advise us that there is a 72 hour minimum time for the ALI database to be updated, which is not real time, and would be of no help to a mobile subscriber.

As to comments that SBC and Verizon have proposed some method of providing 911 to mobile subscribers, Quick simply does not believe their claims. SBC and Verizon both own cellular companies and have inside knowledge on methodology to provide 911 to their subscribers. Reportedly, Cellular providers have spent millions of dollars on the issue and do not have anywhere near ubiquitous 911 coverage.

It is Quick's opinion that VoIP mobile subscriber equipment would have to contain a GPS capability for them to be tracked in real time, then PSAPs would need new software to create the ability for constant real time updates of the GPS information. Then there is the issue of soft phones that can be downloaded from various web site locations for use on laptop PCs of various manufactures and ages, over which no service provider could have any control, to make them GPS compliant.

The issue of tracking citizen's movements, while supposedly conferring a 911 benefit runs smack dab into constitutional privacy issues and the right to be left alone.

Thank you,

Bruce Yuille

President

Quick Connect USA.